



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.

Activity No.: PER20030001

Agency Interest No. 1096

George McGowan
Monsanto Company
PO Box 174
Luling, LA 70070-0174

RE: Part 70 Operating Permit, Monsanto Company - Luling Plant
Monsanto Company, Luling, St. Charles Parish, Louisiana

Dear Mr. McGowan:

This is to inform you that the permit renewal and minor modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the ___ of _____, 2011, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2006.

Permit No.: 2557-V1

Sincerely,

Assistant Secretary

CCB:SJT

c: EPA Region VI

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
MONSANTO COMPANY, DSIDA UNIT
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL AND MINOR MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on the Part 70 Air Operating Permit Renewal and Minor Modification for Monsanto Company, P. O. Box 174, Luling, Louisiana 70070-0174 for the DSIDA Unit. **The facility is located at 12501 River Road approximately one mile east of Luling, St. Charles Parish.**

Monsanto Company produces a variety of products at its Luling Facility with the major product being glyphosate, an active ingredient in Roundup® at the Disodium Iminodiacetate Acid (DSIDA) Unit.

Monsanto Company has requested a Part 70 air permit renewal and minor modification for its DSIDA Unit. Monsanto Company's DSIDA Unit is an existing facility, which operates under permit number 2557-V0 issued on August 18, 1998.

In this permit renewal, Monsanto requested the following changes:

- Remove the following emission points (E.P.) as they were never installed: E.P. 12-98 Hydrogen Flare No. 12; E.P. 15-98 DSIDA Shift Tank No. 7; E.P. 16-98 DSIDA Shift Tank No. 8; E.P. 33-96 Diethanolamine Storage Tank No. 3; Tank 168 NaOH Storage Tank No. 3.
- Incorporate the name changes of the following tanks: E.P. 38-96 Diethanolamine Storage Tank No. 4 renamed to Diethanolamine Barge Tank No. 1; Tank 105 NaOH Storage Tank No. 4 renamed to NaOH Barge Tank No. 1; Tank 125 NaOH Storage Tank No. 5 renamed to NaOH Barge Tank No. 2.
- Incorporate Case-by-Case Insignificant Activity dated July 17, 2003 regarding modifying the configuration of the reactor spray tanks.
- Incorporate Case-by-Case Insignificant Activity dated November 21, 2005 regarding the addition of two Lump Dump Tanks.
- Incorporate a Letter of No Objection dated March 18, 2005 regarding production increases of up to 33% per train via increased reactant feed rates.
- Incorporate "as-built" configuration for Wash Collection Tank (Tank No. 827) which was previously included in the permit expansion project for the permit issued in 1998, but was not included in the permit through an oversight.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.12	0.11	-0.01
SO ₂	0.12	0.01	-0.11
NO _x	13.32	12.21	-1.11
CO	0.96	0.88	-0.08
VOC	1.38	1.19	-0.19

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the statement of basis. All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, November 2, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, Part 70 air operating permit renewal and minor modification, and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy may be reviewed at the Saint Charles Parish Library, Headquarters, 105 Lakewood Drive, Luling, LA 70070.

Inquiries or requests for additional information regarding this permit action should be directed to Scott J. Templet, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3059.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at maillistrequest@ldeq.org or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/ and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 1096, Permit Number 2557-V1, and Activity Number PER20030001.

Publication Date: September 28, 2006

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana**

I. Background

Monsanto Company, Monsanto Company - Luling Plant, is an existing chemical facility. The Monsanto Company - Luling Plant DSIDA Unit currently operates under Permit No. 2557-V0, issued August 18, 1998.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Monsanto Company on February 3, 2003 requesting a Part 70 operating permit renewal. Additional information dated May 6, 2005; July 7, 2006; July 21, 2006; July 26, 2006; August 4, 2006; August 14, 2006 and September 13, 2006 was also received.

III. Description

At the Monsanto Company – Luling Plant DSIDA (Disodium Iminodiacetic Acid) Unit, there is only a one reaction step process which is a catalytic dehydrogenation of diethanolamine. This produces the disodium salt of iminodiacetic acid. Caustic, diethanolamine and catalyst are charged into several reactor trains, heated and reacted under pressure until the reaction is complete. The reaction mass is then cooled and filtered to remove and recycle the catalyst. The product is then piped to the glyphosate intermediate unit in the Luling Plant. The reactor off gas which is a hydrogen stream with trace amounts of diethanolamine, is controlled by a vent condenser and a flare prior to being vented to the atmosphere.

In this permit Monsanto requested to include the following changes:

- Remove the following emission points (E.P.) as they were never installed: E.P. 12-98 Hydrogen Flare No. 12; E.P. 15-98 DSIDA Shift Tank No. 7; E.P. 16-98 DSIDA Shift Tank No. 8; E.P. 33-96 Diethanolamine Storage Tank No. 3; Tank 168 NaOH Storage Tank No. 3.
- Incorporate the name changes of the following tanks: E.P. 38-96 Diethanolamine Storage Tank No. 4 renamed to Diethanolamine Barge Tank No. 1; Tank 105 NaOH Storage Tank No. 4 renamed to NaOH Barge Tank No. 1; Tank 125 NaOH Storage Tank No. 5 renamed to NaOH Barge Tank No. 2.
- Incorporate Case-by-Case Insignificant Activity dated July 17, 2003 regarding modifying the configuration of the reactor spray tanks.

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- Incorporate Case-by-Case Insignificant Activity dated November 21, 2005 regarding the addition of two Lump Dump Tanks.
- Incorporate a Letter of No Objection dated March 18, 2005 regarding production increases of up to 33% per train via increased reactant feed rates.
- Incorporate "as-built" configuration for Wash Collection Tank (Tank No. 827) which was previously included in the permit expansion project for the permit issued in 1998, but was not included in the permit through an oversight.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	0.12	0.11	-0.01
SO ₂	0.12	0.01	-0.11
NO _x	13.32	12.21	-1.11
CO	0.96	0.88	-0.08
VOC *	1.38	1.19	-0.19

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Diethanolamine	1.15	1.15	-

Total

<u>Other VOC (TPY):</u>	DSIDA	0.006
	Other VOC	0.033

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the *St. Charles Herald Guide*, Boutte, on <date>. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
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Luling, St. Charles Parish, Louisiana**

VIII. General Condition XVII Activities

None

IX. Insignificant Activities

<u>ID No.:</u>	<u>Description</u>	<u>Citation</u>
Tank 120	NaOH Storage Tank No. 1 (70,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.B.40
Tank 128	NaOH Storage Tank No. 2 (70,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.B.40
Tank 105	NaOH Barge Tank No. 1 (800,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.B.40
Tank 125	NaOH Barge Tank No. 2 (800,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.B.40
Tank 190	Lump Dump Tank No. 1 (9,200 gallons)	Insignificant Activity per LAC 33:III.501.B.5.A.3
Tank 195	Lump Dump Tank No. 2 (9,200 gallons)	Insignificant Activity per LAC 33:III.501.B.5.A.3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
 Agency Interest No.: 1096
 Monsanto Co
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements		LAC 33:III.Chapter																		
		5 ^A	9	11	13	15	2103	2104*	2107	2111	2115	2125	2113	2121	29*	51*	53*	56	59*	
ID No.:	Description																			
	DSIDA Unit		1																	
GRP 041	Hydrogen Flares 1 - 11			1	1	1														
EQT 117	25A-91 Hydrogen Flare No. 1			1	1	1														
EQT 118	25B-91 Hydrogen Flare No. 2			1	1	1														
EQT 119	25C-91 Hydrogen Flare No. 3			1	1	1														
EQT 120	3-94 Hydrogen Flare No. 4			1	1	1														
EQT 121	4-94 Hydrogen Flare No. 5			1	1	1														
EQT 122	14-95 Hydrogen Flare No. 6	1		1	1	1														
EQT 123	34-95 Hydrogen Flare No. 7	1		1	1	1														
EQT 124	34-96 Hydrogen Flare No. 8	1		1	1	1														
EQT 125	35-96 Hydrogen Flare No. 9	1		1	1	1														
EQT 126	14-97 Hydrogen Flare No. 10	1		1	1	1														
EQT 127	11-98 Hydrogen Flare No. 11			1	1	1														
RLP 016	26-91 Process Area Vent Stack No. 1																			
RLP 017	5-94 Process Area Vent Stack No. 2																			
FUG 04	7-94 Fugitive Emissions																		3	
EQT 130	8-94 Diethanolamine Storage Tank No. 1																			3

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 Luling, St. Charles Parish, Louisiana

Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																	
		5 ^A	9	11	13	15	2103	2104*	2107	2111	2115	2125	2113	2121	29*	51*	53*	56	59*
EQT 131	15-95 Diethanolamine Storage Tank No. 2						3												
EQT 134	16-95 DSIDA Shift Tank No. 1						3												
EQT 135	17-95 DSIDA Shift Tank No. 2						3												
EQT 136	18-95 DSIDA Shift Tank No. 3						3												
EQT 137	19-95 DSIDA Shift Tank No. 4						3												
RLP 018	35-95 Process Area Vent Stack No. 3																		
EQT 138	36-96 DSIDA Shift Tank No. 5						3												
EQT 139	37-96 DSIDA Shift Tank No. 6						3												
EQT 133	38-96 Diethanolamine Barge Tank No. 1						3												
RLP 019	13-98 Process Area Vent Stack No. 4																		
EQT 140	17-98 DSIDA Cooling Tower No. 1																		
EQT 141	18-98 DSIDA Cooling Tower No. 2																		
EQT 142	19-98 DSIDA Cooling Tower No. 3																		
EQT 143	Tank No. 331 Reactor Catch Tank No. 1						3												
EQT 144	Tank No. 337 Reactor Catch Tank No. 2						3												
EQT 145	Tank No. 339 Reactor Catch Tank No. 3						3												
EQT 146	Tank No. 564 Reactor Catch Tank No. 4						3												
EQT 147	Tank No. 565 Reactor Catch Tank No. 5						3												

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Monsanto Co - Luling Plant
Agency Interest No.: 1096**

**Monsanto Co
Luling, St. Charles Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5 [▲]	9	11	13	15	2103	2104*	2107	2111	2115	2125	2113	2121	29*	51*	53*	56	59*	
EQT 148	Tank No. 566 Reactor Catch Tank No. 6						3													
EQT 149	Tank No. 567 Reactor Catch Tank No. 7						3													
EQT 150	Tank No. 568 Reactor Catch Tank No. 8						3													
EQT 151	Tank No. 569 Reactor Catch Tank No. 9						3													
EQT 152	Tank No. 570 Reactor Catch Tank No. 10						3													
EQT 153	Tank No. 571 Reactor Catch Tank No. 11						3													
EQT 156	Tank No. 332 Process Overflow Tank No. 1						3													
EQT 157	Tank No. 334 Process Overflow Tank No. 2						3													
EQT 158	Tank No. 344 Process Overflow Tank No. 3						3													
EQT 159	Tank No. 348 Process Overflow Tank No. 4						3													
EQT 160	Tank No. 401 Filter Feed Tank No. 1						3													
EQT 161	Tank No. 412 Filter Feed Tank No. 2						3													
EQT 162	Tank No. 423 Filter Feed Tank No. 3						3													
EQT 163	Tank No. 604 Filter Feed Tank No. 4						3													
EQT 164	Tank No. 605 Filter Feed Tank No. 5						3													
EQT 165	Tank No. 606 Filter Feed Tank No. 6						3													
EQT 166	Tank No. 607 Filter Feed Tank No. 7						3													
EQT 167	Tank No. 608 Filter Feed Tank No. 8						3													

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
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 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																
		5 ^A	9	11	13	15	2103	2104*	2107	2111	2115	2125	2121	2129*	51*	53*	56	59*
EQT 168	Tank No. 609 Filter Feed Tank No. 9						3											
EQT 169	Tank No. 610 Filter Feed Tank No. 10						3											
EQT 170	Tank No. 611 Filter Feed Tank No. 11						3											
EQT 173	Tank No. 820 Wash Collection Tank						3											
EQT 174	Tank No. 827 Wash Collection Tank						3											
EQT 175	Tank No. 437 Recycle Catalyst Tank No. 1																	
EQT 176	Tank No. 439 Recycle Catalyst Tank No. 2																	
EQT 177	Tank No. 441 Recycle Catalyst Tank No. 3																	
EQT 178	Tank No. 664 Recycle Catalyst Tank No. 4																	
EQT 179	Tank No. 665 Recycle Catalyst Tank No. 5																	
EQT 180	Tank No. 666 Recycle Catalyst Tank No. 6																	
EQT 181	Tank No. 667 Recycle Catalyst Tank No. 7																	
EQT 182	Tank No. 668 Recycle Catalyst Tank No. 8																	
EQT 183	Tank No. 669 Recycle Catalyst Tank No. 9																	
EQT 184	Tank No. 670 Recycle Catalyst Tank No. 10																	
EQT 185	Tank No. 671 Recycle Catalyst Tank No. 11																	
EQT 548	Equipment No. 301 Reactor No. 1										3							
EQT 549	Equipment No. 302 Reactor No. 2										3							

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ID No.:	Description	LAC 33:III.Chapter																	
		5 [▲]	9	11	13	15	2103	2104*	2107	2111	2115	2125	2113	2121	29*	51*	53*	56	59*
EQT 550	Equipment No. 303 Reactor No. 3										3								
EQT 551	Equipment No. 524 Reactor No. 4										3								
EQT 552	Equipment No. 525 Reactor No. 5										3								
EQT 553	Equipment No. 526 Reactor No. 6										3								
EQT 554	Equipment No. 527 Reactor No. 7										3								
EQT 555	Equipment No. 528 Reactor No. 8										3								
EQT 556	Equipment No. 529 Reactor No. 9										3								
EQT 557	Equipment No. 530 Reactor No. 10										3								
EQT 558	Equipment No. 531 Reactor No. 11										3								

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
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Monsanto Co

Luling, St. Charles Parish, Louisiana

have been in place. If the specific criteria changes the source will have to comply at a future date.
3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
Blank - The regulations clearly do not apply to this type of emission source.

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 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR		
		A	K	Ka	Kb	VV	III	RRR	A	J	FF	A	F	Q	VV	FFFF	64	68	82			
EQT 131	15-95 Diethanolamine Storage Tank No. 2				2										1							
EQT 134	16-95 DSIDA Shift Tank No. 1				2																	
EQT 135	17-95 DSIDA Shift Tank No. 2				2																	
EQT 136	18-95 DSIDA Shift Tank No. 3				2																	
EQT 137	19-95 DSIDA Shift Tank No. 4				2																	
RLP 018	35-95 Process Area Vent Stack No. 3																					
EQT 138	36-96 DSIDA Shift Tank No. 5				2																	
EQT 139	37-96 DSIDA Shift Tank No. 6				2																	
EQT 133	38-96 Diethanolamine Barge Tank No. 1				2										1							
RLP 019	13-98 Process Area Vent Stack No. 4																					
EQT 140	17-98 DSIDA Cooling Tower No. 1													2								
EQT 141	18-98 DSIDA Cooling Tower No. 2													2								
EQT 142	19-98 DSIDA Cooling Tower No. 3													2								
EQT 143	Tank No. 331 Reactor Catch Tank No. 1				2																	
EQT 144	Tank No. 337 Reactor Catch Tank No. 2				2																	
EQT 145	Tank No. 339 Reactor Catch Tank No. 3				2																	
EQT 146	Tank No. 564 Reactor Catch Tank No. 4				2																	
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EQT 148	Tank No. 566 Reactor Catch Tank No. 6				2														
EQT 149	Tank No. 567 Reactor Catch Tank No. 7				2														
EQT 150	Tank No. 568 Reactor Catch Tank No. 8				2														
EQT 151	Tank No. 569 Reactor Catch Tank No. 9				2														
EQT 152	Tank No. 570 Reactor Catch Tank No. 10				2														
EQT 153	Tank No. 571 Reactor Catch Tank No. 11				2														
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EQT 159	Tank No. 348 Process Overflow Tank No. 4				2														
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EQT 162	Tank No. 423 Filter Feed Tank No. 3				2														
EQT 163	Tank No. 604 Filter Feed Tank No. 4				2														
EQT 164	Tank No. 605 Filter Feed Tank No. 5				2														
EQT 165	Tank No. 606 Filter Feed Tank No. 6				2														
EQT 166	Tank No. 607 Filter Feed Tank No. 7				2														
EQT 167	Tank No. 608 Filter Feed Tank No. 8				2														

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EQT 168	Tank No. 609 Filter Feed Tank No. 9				2															
EQT 169	Tank No. 610 Filter Feed Tank No. 10				2															
EQT 170	Tank No. 611 Filter Feed Tank No. 11				2															
EQT 173	Tank No. 820 Wash Collection Tank				2															
EQT 174	Tank No. 827 Wash Collection Tank				2															
EQT 175	Tank No. 437 Recycle Catalyst Tank No. 1				3															
EQT 176	Tank No. 439 Recycle Catalyst Tank No. 2				3															
EQT 177	Tank No. 441 Recycle Catalyst Tank No. 3				3															
EQT 178	Tank No. 664 Recycle Catalyst Tank No. 4				3															
EQT 179	Tank No. 665 Recycle Catalyst Tank No. 5				3															
EQT 180	Tank No. 666 Recycle Catalyst Tank No. 6				3															
EQT 181	Tank No. 667 Recycle Catalyst Tank No. 7				3															
EQT 182	Tank No. 668 Recycle Catalyst Tank No. 8				3															
EQT 183	Tank No. 669 Recycle Catalyst Tank No. 9				3															
EQT 184	Tank No. 670 Recycle Catalyst Tank No. 10				3															
EQT 185	Tank No. 671 Recycle Catalyst Tank No. 11				3															
EQT 548	Equipment No. 301 Reactor No. 1									3										
EQT 549	Equipment No. 302 Reactor No. 2									3										

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
 Agency Interest No.: 1096
 Monsanto Co
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS							40 CFR 61				40 CFR 63 NESHAP				40 CFR		
		A	K	Ka	Kb	VV	III	RRR	A	J	FF	A	F	Q	VV	FFFF	64	68	82
EQT 550	Equipment No. 303 Reactor No. 3						3	3											
EQT 551	Equipment No. 524 Reactor No. 4						3	3											
EQT 552	Equipment No. 525 Reactor No. 5						3	3											
EQT 553	Equipment No. 526 Reactor No. 6						3	3											
EQT 554	Equipment No. 527 Reactor No. 7						3	3											
EQT 555	Equipment No. 528 Reactor No. 8						3	3											
EQT 556	Equipment No. 529 Reactor No. 9						3	3											
EQT 557	Equipment No. 530 Reactor No. 10						3	3											
EQT 558	Equipment No. 531 Reactor No. 11						3	3											

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
 Agency Interest No.: 1096
 Monsanto Co
 Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
DSIDA Unit	LAC 33:III.2125 Vapor Degreasers	EXEMPT. Degreasers are exempt per 2125.D.
EQT 117 - 127 Hydrogen Flares No. 1 - 11	40 CFR 64 Compliance Assurance Monitoring for Major Stationary Sources	DOES NOT APPLY. No Pollutant Specific Emission Units have pre-controlled emissions equal to or greater than major source classification levels. 64.2(a)(3)
FUG 04 Fugitive Emissions	LAC 33:III.Chapter 15 Emission Standards for Sulfur Dioxide	EXEMPT. Exempt from 1503.C. and 1511.A. due to emitting less than 250 TPY of sulfur compounds measured as SO ₂ . Recordkeeping and reporting provisions of 1513 apply.
EQT 175 - 185 Recycle Catalyst Tanks	LAC 33:III.2121 Fugitive Emission Control	DOES NOT APPLY. The DSIDA process is not a regulated process under this fugitive control program.
EQT 140 - 142 Cooling Towers	40 CFR 60, Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY. Tanks are less than 10,000 gallons.
	40 CFR 63, Subpart Q Industrial Process Cooling Towers 63.400(a)	DOES NOT APPLY. Facility does not use chromium-based water treatment chemicals.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
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 Monsanto Co
 Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT 130, 131, 133, 134, 135, 136, 137, 138, 139	LAC 33:III.2103 Storage of Volatile Organic Compounds	DOES NOT APPLY. Contents have a true vapor pressure less than 1.5 psia at storage conditions.
Diethanolamine Storage Tanks (1, 2) and Barge Tank (1)	40 CFR 60, Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b]	EXEMPT. Vapor pressure of contents is less than 3.5 kPa (0.5 psia)
DSIDA Shift Tanks (1-6)		
EQT 143 - 153, 156 - 170, 173, 174		
Reactor Catch Tanks		
Process Overflow Tanks		
Filter Feed Tanks		
Wash Collection Tanks		
EQT 548 - 558 DSIDA Reactors (No. 1 - 11)	Waste Gas Disposal LAC 33:III.2115	DOES NOT APPLY. The reactors' vent gas streams have a combined weight of VOC less than 100 lbs in any continuous 24-hour period. LAC 33:III.2115.H.4.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Co - Luling Plant
 Agency Interest No.: 1096
 Monsanto Co
 Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT 548 - 558 DSIDA Reactors (No. 1 - 11)	40 CFR 60, Subpart III Air Oxidation Unit Process 40 CFR 60.610	DEOS NOT APPLY. The reactor systems are not air oxidation processes.
	40 CFR 60, Subpart RRR Reactor Process 40 CFR 60.700	DOES NOT APPLY. The reactor systems are not regulated reactor processes.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit. [Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement. [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of

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attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;

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5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

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- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

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- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated February 3, 2003 along with supplemental information dated May 6, 2005; July 7, 2006; July 21, 2006; July 26, 2006; August 4, 2006; August 14, 2006 and September 13, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
- A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
- B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.
- The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
- This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September

**LOUISIANA AIR EMISSION PERMIT
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4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's

**LOUISIANA AIR EMISSION PERMIT
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premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1096 Monsanto Co - Luling Plant
 Activity Number: PER20030001
 Permit Number: 2557-V1
 Air - Title V Regular Permit Renewal

ID	Name	User Group	Start Date
LAO4924	Monsanto Agricultura	Air Permitting	08-05-2002
2520-00005	ADVF #	Asbestos	01-16-2003
2520-0005	Monsanto Co - Luling Plant	CDS Number	08-07-1970
43-0420020	Monsanto Co - Luling Plant	Emission Inventory	03-03-2004
LAD001700756	Monsanto Co - Luling Plant	Federal Tax ID	11-21-1999
PMT/PC/CA	Monsanto Co Luling	Hazardous Waste Notification	08-18-1980
LAD001700756	GPR Baselines	Hazardous Waste Permitting	10-01-1997
LA0005266	Monsanto	Inactive & Abandoned Sites	08-04-1981
WP1251	WPC File Number	LPDES Permit #	05-22-2003
LA-2216-L01	WPC State Permit Number	LWDPS Permit #	06-25-2003
11085	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GD-089-1769	Radioactive Material License	Radiation License Number	12-20-2000
45673	X-Ray Registration Number	Radiation X-ray Registration Number	09-08-2004
48373	Site ID #	Solid Waste Facility No.	04-30-2001
2520-0005	Monsanto Ag Products Co	TEMPO Merge	03-15-2001
45006590	Monsanto Co	TEMPO Merge	03-15-2001
	Toxic Emissions Data Inventory #	Toxic Emissions Data Inventory #	01-01-1991
	UST Facility ID (from UST legacy data)	Underground Storage Tanks	10-12-2002

Physical Location: 12501 River Rd (portion of) Luling, LA 70070 Main Phone: 9857858211

Mailing Address: PO Box 174 Luling, LA 700700174

Location of Front Gate: 29° 55' 33" 76 hundredths latitude, 90° 20' 57" 67 hundredths longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD27

Name	Mailing Address	Phone (Type)	Relationship
Armand Bourque		9857856217 (WP)	Katrina Response Contact for
Darren Clouatre	12501 River Rd Luling, LA 70070	darren.p.clouatre@n	Radiation Safety Officer for
Darren Clouatre	12501 River Rd Luling, LA 70070	9857853586 (WP)	Radiation Safety Officer for
Darren Clouatre	12501 River Rd Luling, LA 70070	darren.p.clouatre@n	Radiation Contact For
Darren Clouatre	12501 River Rd Luling, LA 70070	9857853586 (WP)	Radiation Contact For
Darren Clouatre	12501 River Rd Luling, LA 70070	9857853845 (WF)	Radiation Safety Officer for
Darren Clouatre	12501 River Rd Luling, LA 70070	9857853845 (WF)	Radiation Contact For
Allen R. Dent	12501 S River Rd Luling, LA 70070	9857853578 (WP)	Hazardous Waste Permit Contact For

General Information

AI ID: 1096 Monsanto Co - Luling Plant
 Activity Number: PER20030001
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 Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	George A. McGowan	PO Box 174 Luling, LA 700700174	9857858211 (WP)	Responsible Official for
	George A. McGowan	PO Box 174 Luling, LA 700700174	9857858211 (WP)	Haz. Waste Billing Party for
	George A. McGowan	PO Box 174 Luling, LA 700700174	9857858211 (WP)	Water Billing Party for
	William Rhodes II	PO Box 174 Luling, LA 700700174	9857853866 (WP)	Air Permit Contact For
	William Rhodes II	PO Box 174 Luling, LA 700700174	9857853346 (WF)	Air Permit Contact For

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Operates
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Air Billing Party for
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Water Billing Party for
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Haz. Waste Billing Party for
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Radiation License Billing Party for
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Radiation Registration Billing Party for
	Monsanto Co	PO Box 174 Luling, LA 700700174	9857853211 (WP)	Owns
	Monsanto Co CT Corporation System	8550 United Plaza Blvd Baton Rouge, LA 70809		Agent of Service for

SIC Codes: 2899, Chemical preparations, nec

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030001
 Permit Number: 2557-V1
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT117	25A-91 Hydrogen Flare No. 1		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT118	25B-91 Hydrogen Flare No. 2		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT119	25C-91 Hydrogen Flare No. 3		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT120	3-94 Hydrogen Flare No. 4		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT121	4-94 Hydrogen Flare No. 5		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT122	14-95 Hydrogen Flare No. 6		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT123	34-95 Hydrogen Flare No. 7		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT124	34-96 Hydrogen Flare No. 8		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT125	35-96 Hydrogen Flare No. 9		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT126	14-97 Hydrogen Flare No. 10		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT127	11-98 Hydrogen Flare No. 11		.48 MM BTU/hr			8760 hr/yr (All Year)
EQT130	8-94 Diethanolamine Storage Tank No. 1	70000 gallons				8760 hr/yr (All Year)
EQT131	15-95 Diethanolamine Storage Tank No. 2	70000 gallons				8760 hr/yr (All Year)
EQT133	38-96 Diethanolamine Barge Tank No. 1	860000 gallons				8760 hr/yr (All Year)
EQT134	16-95 DSIDA Shift Tank No. 1	37500 gallons				8760 hr/yr (All Year)
EQT135	17-95 DSIDA Shift Tank No. 2	37500 gallons				8760 hr/yr (All Year)
EQT136	18-95 DSIDA Shift Tank No. 3	37500 gallons				8760 hr/yr (All Year)
EQT137	19-95 DSIDA Shift Tank No. 4	37500 gallons				8760 hr/yr (All Year)
EQT138	36-96 DSIDA Shift Tank No. 5	37500 gallons				8760 hr/yr (All Year)
EQT139	37-96 DSIDA Shift Tank No. 6	37500 gallons				8760 hr/yr (All Year)
EQT140	17-98 Cooling Tower No. 1		7000 gallons/min			8760 hr/yr (All Year)
EQT141	18-98 Cooling Tower No. 2		4200 gallons/min			8760 hr/yr (All Year)
EQT142	19-98 Cooling Tower No. 3		4200 gallons/min			8760 hr/yr (All Year)
EQT143	Tank No. 331 Reactor Catch Tank No. 1	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT144	Tank No. 337 Reactor Catch Tank No. 2	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT145	Tank No. 339 Reactor Catch Tank No. 3	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT146	Tank No. 564 Reactor Catch Tank No. 4	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT147	Tank No. 565 Reactor Catch Tank No. 5	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT148	Tank No. 566 Reactor Catch Tank No. 6	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT149	Tank No. 567 Reactor Catch Tank No. 7	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT150	Tank No. 568 Reactor Catch Tank No. 8	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT151	Tank No. 569 Reactor Catch Tank No. 9	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT152	Tank No. 570 Reactor Catch Tank No. 10	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT153	Tank No. 571 Reactor Catch Tank No. 11	16000 gallons			DEA, NaOH, catalyst, & water	8760 hr/yr (All Year)
EQT156	Tank No. 332 Process Overflow Tank No. 1	12000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT157	Tank No. 334 Process Overflow Tank No. 2	12000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT158	Tank No. 344 Process Overflow Tank No. 3	12000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT159	Tank No. 348 Process Overflow Tank No. 4	12000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT160	Tank No. 401 Filter Feed Tank No. 1	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT161	Tank No. 412 Filter Feed Tank No. 2	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT162	Tank No. 423 Filter Feed Tank No. 3	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT163	Tank No. 604 Filter Feed Tank No. 4	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT164	Tank No. 605 Filter Feed Tank No. 5	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT165	Tank No. 606 Filter Feed Tank No. 6	11000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT166	Tank No. 607 Filter Feed Tank No. 7	13000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT167	Tank No. 608 Filter Feed Tank No. 8	13000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT168	Tank No. 609 Filter Feed Tank No. 9	13000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT169	Tank No. 610 Filter Feed Tank No. 10	13000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT170	Tank No. 611 Filter Feed Tank No. 11	13000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT173	Tank No. 820 Wash Collection Tank	20000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT174	Tank No. 827 Wash Collection Tank	20000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT175	Tank No. 437 Recycle Catalyst Tank No. 1	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT176	Tank No. 439 Recycle Catalyst Tank No. 2	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT177	Tank No. 441 Recycle Catalyst Tank No. 3	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT178	Tank No. 664 Recycle Catalyst Tank No. 4	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT179	Tank No. 665 Recycle Catalyst Tank No. 5	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT180	Tank No. 666 Recycle Catalyst Tank No. 6	9000 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT181	Tank No. 667 Recycle Catalyst Tank No. 7	9500 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT182	Tank No. 668 Recycle Catalyst Tank No. 8	9500 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT183	Tank No. 669 Recycle Catalyst Tank No. 9	9500 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT184	Tank No. 670 Recycle Catalyst Tank No. 10	9500 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT185	Tank No. 671 Recycle Catalyst Tank No. 11	9500 gallons			DSIDA, catalyst, & water	8760 hr/yr (All Year)
EQT548	Equipment No. 301 Reactor No. 1				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT549	Equipment No. 302 Reactor No. 2				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT550	Equipment No. 303 Reactor No. 3				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT551	Equipment No. 524 Reactor No. 4				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT552	Equipment No. 525 Reactor No. 5				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT553	Equipment No. 526 Reactor No. 6				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT554	Equipment No. 527 Reactor No. 7				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)

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Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT555	Equipment No. 528 Reactor No. 8				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT556	Equipment No. 529 Reactor No. 9				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT557	Equipment No. 530 Reactor No. 10				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
EQT558	Equipment No. 531 Reactor No. 11				DEA, NaOH, catalyst, DSIDA, & water	8760 hr/yr (All Year)
FUG004	7-94 Fugitive Emissions from DSIDA Plant					8760 hr/yr (All Year)
RLP016	26-91 Process Area Vent Stack No. 1					8760 hr/yr (All Year)
RLP017	5-94 Process Area Vent Stack No. 2					8760 hr/yr (All Year)
RLP018	35-95 Process Area Vent Stack No. 3					8760 hr/yr (All Year)
RLP019	13-98 Process Area Vent Stack No. 4					8760 hr/yr (All Year)

Subject Item Groups:

ID	Description	Included Components (from Above)
GRP022	DSIDA Facility	EQT117 25A-91 Hydrogen Flare No. 1
GRP022	DSIDA Facility	EQT118 25B-91 Hydrogen Flare No. 2
GRP022	DSIDA Facility	EQT119 25C-91 Hydrogen Flare No. 3
GRP022	DSIDA Facility	EQT120 3-94 Hydrogen Flare No. 4
GRP022	DSIDA Facility	EQT121 4-94 Hydrogen Flare No. 5
GRP022	DSIDA Facility	EQT122 14-95 Hydrogen Flare No. 6
GRP022	DSIDA Facility	EQT123 34-95 Hydrogen Flare No. 7
GRP022	DSIDA Facility	EQT124 34-96 Hydrogen Flare No. 8
GRP022	DSIDA Facility	EQT125 35-96 Hydrogen Flare No. 9
GRP022	DSIDA Facility	EQT126 14-97 Hydrogen Flare No. 10
GRP022	DSIDA Facility	EQT127 11-98 Hydrogen Flare No. 11
GRP022	DSIDA Facility	EQT130 8-94 Diethanolamine Storage Tank No. 1
GRP022	DSIDA Facility	EQT131 15-95 Diethanolamine Storage Tank No. 2
GRP022	DSIDA Facility	EQT133 38-96 Diethanolamine Barge Tank No. 1
GRP022	DSIDA Facility	EQT134 16-95 DSIDA Shift Tank No. 1
GRP022	DSIDA Facility	EQT135 17-95 DSIDA Shift Tank No. 2
GRP022	DSIDA Facility	EQT136 18-95 DSIDA Shift Tank No. 3
GRP022	DSIDA Facility	EQT137 19-95 DSIDA Shift Tank No. 4
GRP022	DSIDA Facility	EQT138 36-96 DSIDA Shift Tank No. 5
GRP022	DSIDA Facility	EQT139 37-96 DSIDA Shift Tank No. 6
GRP022	DSIDA Facility	EQT140 17-98 Cooling Tower No. 1
GRP022	DSIDA Facility	EQT141 18-98 Cooling Tower No. 2

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Subject Item Groups:

ID	Description	Included Components (from Above)
GRP022	DSIDA Facility	EQT142 19-98 Cooling Tower No. 3
GRP022	DSIDA Facility	EQT143 Tank No. 331 Reactor Catch Tank No. 1
GRP022	DSIDA Facility	EQT144 Tank No. 337 Reactor Catch Tank No. 2
GRP022	DSIDA Facility	EQT145 Tank No. 339 Reactor Catch Tank No. 3
GRP022	DSIDA Facility	EQT146 Tank No. 564 Reactor Catch Tank No. 4
GRP022	DSIDA Facility	EQT147 Tank No. 565 Reactor Catch Tank No. 5
GRP022	DSIDA Facility	EQT148 Tank No. 566 Reactor Catch Tank No. 6
GRP022	DSIDA Facility	EQT149 Tank No. 567 Reactor Catch Tank No. 7
GRP022	DSIDA Facility	EQT150 Tank No. 568 Reactor Catch Tank No. 8
GRP022	DSIDA Facility	EQT151 Tank No. 569 Reactor Catch Tank No. 9
GRP022	DSIDA Facility	EQT152 Tank No. 570 Reactor Catch Tank No. 10
GRP022	DSIDA Facility	EQT153 Tank No. 571 Reactor Catch Tank No. 11
GRP022	DSIDA Facility	EQT155 Tank No. 332 Process Overflow Tank No. 1
GRP022	DSIDA Facility	EQT157 Tank No. 334 Process Overflow Tank No. 2
GRP022	DSIDA Facility	EQT158 Tank No. 344 Process Overflow Tank No. 3
GRP022	DSIDA Facility	EQT159 Tank No. 348 Process Overflow Tank No. 4
GRP022	DSIDA Facility	EQT160 Tank No. 401 Filter Feed Tank No. 1
GRP022	DSIDA Facility	EQT161 Tank No. 412 Filter Feed Tank No. 2
GRP022	DSIDA Facility	EQT162 Tank No. 423 Filter Feed Tank No. 3
GRP022	DSIDA Facility	EQT163 Tank No. 604 Filter Feed Tank No. 4
GRP022	DSIDA Facility	EQT164 Tank No. 605 Filter Feed Tank No. 5
GRP022	DSIDA Facility	EQT165 Tank No. 606 Filter Feed Tank No. 6
GRP022	DSIDA Facility	EQT166 Tank No. 607 Filter Feed Tank No. 7
GRP022	DSIDA Facility	EQT167 Tank No. 608 Filter Feed Tank No. 8
GRP022	DSIDA Facility	EQT168 Tank No. 609 Filter Feed Tank No. 9
GRP022	DSIDA Facility	EQT169 Tank No. 610 Filter Feed Tank No. 10
GRP022	DSIDA Facility	EQT170 Tank No. 611 Filter Feed Tank No. 11
GRP022	DSIDA Facility	EQT173 Tank No. 820 Wash Collection Tank
GRP022	DSIDA Facility	EQT174 Tank No. 827 Wash Collection Tank
GRP022	DSIDA Facility	EQT175 Tank No. 437 Recycle Catalyst Tank No. 1
GRP022	DSIDA Facility	EQT176 Tank No. 439 Recycle Catalyst Tank No. 2
GRP022	DSIDA Facility	EQT177 Tank No. 441 Recycle Catalyst Tank No. 3
GRP022	DSIDA Facility	EQT178 Tank No. 664 Recycle Catalyst Tank No. 4
GRP022	DSIDA Facility	EQT179 Tank No. 665 Recycle Catalyst Tank No. 5
GRP022	DSIDA Facility	EQT180 Tank No. 666 Recycle Catalyst Tank No. 6
GRP022	DSIDA Facility	EQT181 Tank No. 667 Recycle Catalyst Tank No. 7
GRP022	DSIDA Facility	EQT182 Tank No. 668 Recycle Catalyst Tank No. 8

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Subject Item Groups:

ID	Description	Included Components (from Above)
GRP022	DSIDA Facility	EQT183 Tank No. 669 Recycle Catalyst Tank No. 9
GRP022	DSIDA Facility	EQT184 Tank No. 670 Recycle Catalyst Tank No. 10
GRP022	DSIDA Facility	EQT185 Tank No. 671 Recycle Catalyst Tank No. 11
GRP022	DSIDA Facility	EQT548 Equipment No. 301 Reactor No. 1
GRP022	DSIDA Facility	EQT549 Equipment No. 302 Reactor No. 2
GRP022	DSIDA Facility	EQT550 Equipment No. 303 Reactor No. 3
GRP022	DSIDA Facility	EQT551 Equipment No. 524 Reactor No. 4
GRP022	DSIDA Facility	EQT552 Equipment No. 525 Reactor No. 5
GRP022	DSIDA Facility	EQT553 Equipment No. 526 Reactor No. 6
GRP022	DSIDA Facility	EQT554 Equipment No. 527 Reactor No. 7
GRP022	DSIDA Facility	EQT555 Equipment No. 528 Reactor No. 8
GRP022	DSIDA Facility	EQT556 Equipment No. 529 Reactor No. 9
GRP022	DSIDA Facility	EQT557 Equipment No. 530 Reactor No. 10
GRP022	DSIDA Facility	EQT558 Equipment No. 531 Reactor No. 11
GRP022	DSIDA Facility	FUG4 7-94 Fugitive Emissions from DSIDA Plant
GRP022	DSIDA Facility	RLP16 26-91 Process Area Vent Stack No. 1
GRP022	DSIDA Facility	RLP17 5-94 Process Area Vent Stack No. 2
GRP022	DSIDA Facility	RLP18 35-95 Process Area Vent Stack No. 3
GRP022	DSIDA Facility	RLP19 13-98 Process Area Vent Stack No. 4
GRP041	Hydrogen Flares 1 - 11	EQT117 25A-91 Hydrogen Flare No. 1
GRP041	Hydrogen Flares 1 - 11	EQT118 25B-91 Hydrogen Flare No. 2
GRP041	Hydrogen Flares 1 - 11	EQT119 25C-91 Hydrogen Flare No. 3
GRP041	Hydrogen Flares 1 - 11	EQT120 3-94 Hydrogen Flare No. 4
GRP041	Hydrogen Flares 1 - 11	EQT121 4-94 Hydrogen Flare No. 5
GRP041	Hydrogen Flares 1 - 11	EQT122 14-95 Hydrogen Flare No. 6
GRP041	Hydrogen Flares 1 - 11	EQT123 34-95 Hydrogen Flare No. 7
GRP041	Hydrogen Flares 1 - 11	EQT124 34-96 Hydrogen Flare No. 8
GRP041	Hydrogen Flares 1 - 11	EQT125 35-96 Hydrogen Flare No. 9
GRP041	Hydrogen Flares 1 - 11	EQT126 14-97 Hydrogen Flare No. 10
GRP041	Hydrogen Flares 1 - 11	EQT127 11-98 Hydrogen Flare No. 11
GRP042	Hydrogen Flares 6 - 10	EQT122 14-95 Hydrogen Flare No. 6
GRP042	Hydrogen Flares 6 - 10	EQT123 34-95 Hydrogen Flare No. 7
GRP042	Hydrogen Flares 6 - 10	EQT124 34-96 Hydrogen Flare No. 8
GRP042	Hydrogen Flares 6 - 10	EQT125 35-96 Hydrogen Flare No. 9
GRP042	Hydrogen Flares 6 - 10	EQT126 14-97 Hydrogen Flare No. 10
GRP043	Diethanolamine Tanks	EQT130 8-94 Diethanolamine Storage Tank No. 1
GRP043	Diethanolamine Tanks	EQT131 15-95 Diethanolamine Storage Tank No. 2

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Subject Item Groups:	
ID	Description
GRP043	Diethanolamine Tanks
	EQ1133 38-96 Diethanolamine Barge Tank No. 1

Relationships:	Subject Item	Relationship	Subject Item
	EQ1117 25A-91 Hydrogen Flare No. 1	Controls emissions from	EQ1143 Tank No. 331 Reactor Catch Tank No. 1
	EQ1117 25A-91 Hydrogen Flare No. 1	Controls emissions from	EQ1548 Equipment No. 301 Reactor No. 1
	EQ1118 25B-91 Hydrogen Flare No. 2	Controls emissions from	EQ1144 Tank No. 337 Reactor Catch Tank No. 2
	EQ1118 25B-91 Hydrogen Flare No. 2	Controls emissions from	EQ1549 Equipment No. 302 Reactor No. 2
	EQ1119 25C-91 Hydrogen Flare No. 3	Controls emissions from	EQ1145 Tank No. 339 Reactor Catch Tank No. 3
	EQ1119 25C-91 Hydrogen Flare No. 3	Controls emissions from	EQ1550 Equipment No. 303 Reactor No. 3
	EQ1120 3-94 Hydrogen Flare No. 4	Controls emissions from	EQ1146 Tank No. 564 Reactor Catch Tank No. 4
	EQ1120 3-94 Hydrogen Flare No. 4	Controls emissions from	EQ1551 Equipment No. 524 Reactor No. 4
	EQ1121 4-94 Hydrogen Flare No. 5	Controls emissions from	EQ1147 Tank No. 565 Reactor Catch Tank No. 5
	EQ1121 4-94 Hydrogen Flare No. 5	Controls emissions from	EQ1552 Equipment No. 525 Reactor No. 5
	EQ1122 14-95 Hydrogen Flare No. 6	Controls emissions from	EQ1148 Tank No. 566 Reactor Catch Tank No. 6
	EQ1122 14-95 Hydrogen Flare No. 6	Controls emissions from	EQ1553 Equipment No. 526 Reactor No. 6
	EQ1123 34-95 Hydrogen Flare No. 7	Controls emissions from	EQ1149 Tank No. 567 Reactor Catch Tank No. 7
	EQ1123 34-95 Hydrogen Flare No. 7	Controls emissions from	EQ1554 Equipment No. 527 Reactor No. 7
	EQ1124 34-96 Hydrogen Flare No. 8	Controls emissions from	EQ1150 Tank No. 568 Reactor Catch Tank No. 8
	EQ1124 34-96 Hydrogen Flare No. 8	Controls emissions from	EQ1555 Equipment No. 528 Reactor No. 8
	EQ1125 35-96 Hydrogen Flare No. 9	Controls emissions from	EQ1151 Tank No. 569 Reactor Catch Tank No. 9
	EQ1125 35-96 Hydrogen Flare No. 9	Controls emissions from	EQ1556 Equipment No. 529 Reactor No. 9
	EQ1126 14-97 Hydrogen Flare No. 10	Controls emissions from	EQ1152 Tank No. 570 Reactor Catch Tank No. 10
	EQ1126 14-97 Hydrogen Flare No. 10	Controls emissions from	EQ1557 Equipment No. 530 Reactor No. 10
	EQ1127 11-98 Hydrogen Flare No. 11	Controls emissions from	EQ1153 Tank No. 571 Reactor Catch Tank No. 11
	EQ1127 11-98 Hydrogen Flare No. 11	Controls emissions from	EQ1558 Equipment No. 531 Reactor No. 11
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1156 Tank No. 332 Process Overflow Tank No. 1
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1160 Tank No. 401 Filter Feed Tank No. 1
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1161 Tank No. 412 Filter Feed Tank No. 2
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1162 Tank No. 423 Filter Feed Tank No. 3
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1173 Tank No. 820 Wash Collection Tank
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1175 Tank No. 437 Recycle Catalyst Tank No. 1
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1176 Tank No. 439 Recycle Catalyst Tank No. 2
	RLP16 26-91 Process Area Vent Stack No. 1	Controls emissions from	EQ1177 Tank No. 441 Recycle Catalyst Tank No. 3
	RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQ1157 Tank No. 334 Process Overflow Tank No. 2
	RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQ1163 Tank No. 604 Filter Feed Tank No. 4
	RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQ1164 Tank No. 605 Filter Feed Tank No. 5

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
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Relationships:

Subject Item	Relationship	Subject Item
RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQT165 Tank No. 606 Filter Feed Tank No. 6
RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQT178 Tank No. 664 Recycle Catalyst Tank No. 4
RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQT179 Tank No. 665 Recycle Catalyst Tank No. 5
RLP17 5-94 Process Area Vent Stack No. 2	Controls emissions from	EQT180 Tank No. 666 Recycle Catalyst Tank No. 6
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT158 Tank No. 344 Process Overflow Tank No. 3
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT166 Tank No. 607 Filter Feed Tank No. 7
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT167 Tank No. 608 Filter Feed Tank No. 8
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT168 Tank No. 609 Filter Feed Tank No. 9
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT174 Tank No. 827 Wash Collection Tank
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT181 Tank No. 667 Recycle Catalyst Tank No. 7
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT182 Tank No. 668 Recycle Catalyst Tank No. 8
RLP18 35-95 Process Area Vent Stack No. 3	Controls emissions from	EQT183 Tank No. 669 Recycle Catalyst Tank No. 9
RLP19 13-98 Process Area Vent Stack No. 4	Controls emissions from	EQT159 Tank No. 348 Process Overflow Tank No. 4
RLP19 13-98 Process Area Vent Stack No. 4	Controls emissions from	EQT169 Tank No. 610 Filter Feed Tank No. 10
RLP19 13-98 Process Area Vent Stack No. 4	Controls emissions from	EQT170 Tank No. 611 Filter Feed Tank No. 11
RLP19 13-98 Process Area Vent Stack No. 4	Controls emissions from	EQT184 Tank No. 670 Recycle Catalyst Tank No. 10
RLP19 13-98 Process Area Vent Stack No. 4	Controls emissions from	EQT185 Tank No. 671 Recycle Catalyst Tank No. 11

Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT117	87.1	8120	1.41		162	1832
EQT118	87.1	8120	1.41		162	1832
EQT119	87.1	8120	1.41		162	1832
EQT120	87.1	8120	1.41		162	1832
EQT121	87.1	8120	1.41		162	1832
EQT122	87.1	8120	1.41		162	1832
EQT123	87.1	8120	1.41		162	1832
EQT124	87.1	8120	1.41		162	1832
EQT125	87.1	8120	1.41		162	1832
EQT126	87.1	8120	1.41		162	1832
EQT127	87.1	8120	1.41		162	1832
EQT130	13	21	.33		36	104
EQT131	13	21	.33		36	104
EQT133	3	130	1		35	104
EQT134	38.97	200	.33		36	104
EQT135	38.97	200	.33		36	104
EQT136	38.97	200	.33		36	104
EQT137	38.97	200	.33		36	104
EQT138	38.97	200	.33		36	104

INVENTORIES

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Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT139	38.97	200	.33		36	104
RLP016		21	.8		162	1000
RLP017		21	.8		162	1000
RLP018		21	.8		162	1000
RLP019		21	.8		162	1000

Fee Information:

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP022	864	MM Lb/Yr	0690 - Chemical and Chemical Prep. N.E.C. (Rated Capacity)

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
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 Permit Number: 2557-V1
 Air - Title V Regular Permit Renewal

All phases

Subject Item	PM ₁₀			SO ₂			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 117 25A-91	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 118 25B-91	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 119 25C-91	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 120 3-94	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 121 4-94	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 122 14-85	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 123 34-85	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 124 34-86	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 125 35-96	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 126 14-97	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 127 11-98	< 0.01	< 0.01	0.01	< 0.01	< 0.01	0.001	0.25	0.51	1.11	0.02	0.04	0.08	< 0.01	< 0.01	0.006
EQT 130 8-94													< 0.01	0.02	0.01
EQT 131 15-95													< 0.01	0.02	0.01
EQT 133 38-96													0.01	0.04	0.05
EQT 134 16-95													< 0.01	< 0.01	0.001
EQT 135 17-95													< 0.01	< 0.01	0.001
EQT 136 18-95													< 0.01	< 0.01	0.001
EQT 137 19-95													< 0.01	< 0.01	0.001

EMISSION RATES FOR CRITERIA POLLUTANTS

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 Activity Number: PER20030001
 Permit Number: 2557-V1
 Air - Title V Regular Permit Renewal

All phases

Subject Item	PM ₁₀			SO ₂			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 138 36-96													< 0.01	< 0.01	0.001
EQT 139 37-96													< 0.01	< 0.01	0.001
EQT 140 17-98													< 0.01	15	< 0.01
EQT 141 18-98													< 0.01	15	< 0.01
EQT 142 19-98													< 0.01	15	< 0.01
FUG 004 7-94													0.24	0.48	1.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Phase Totals:

PM10: 0.11 tons/yr
 SO2: 0.01 tons/yr
 NOx: 12.21 tons/yr
 CO: 0.88 tons/yr
 VOC: 1.19 tons/yr

Emission rates Notes:

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
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All phases

Diethanolamine			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
EQT 117 25A-91	< 0.01	< 0.01	0.003
EQT 118 25B-91	< 0.01	< 0.01	0.003
EQT 119 25C-91	< 0.01	< 0.01	0.003
EQT 120 3-94	< 0.01	< 0.01	0.003
EQT 121 4-94	< 0.01	< 0.01	0.003
EQT 122 14-95	< 0.01	< 0.01	0.003
EQT 123 34-95	< 0.01	< 0.01	0.003
EQT 124 34-96	< 0.01	< 0.01	0.003
EQT 125 35-96	< 0.01	< 0.01	0.003
EQT 126 14-97	< 0.01	< 0.01	0.003
EQT 127 11-98	< 0.01	< 0.01	0.003
EQT 130 8-94	< 0.01	0.02	0.01
EQT 131 15-95	< 0.01	0.02	0.01
EQT 133 38-96	0.01	0.04	0.05
FUG 004 7-94	0.24	0.48	1.05

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Parameter Totals:

Diethanolamine: 1.15 tons/yr

Emission Rates Notes:

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030001

Permit Number: 2557-V1

Air - Title V Regular Permit Renewal

All phases

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20030001
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UG004 7-94 Fugitive Emissions from DSIDA Plant

- 1 Comply with 40 CFR 63 Subpart FFFF table 6. DEA is a heavy liquid. [40 CFR 63.2480]

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- 2 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 3 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.2119]
- 4 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited. [LAC 33:III.2901.D]
- 5 If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G. [LAC 33:III.2901.F]
- 6 VOC, Total \leq 1.19 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 7 Carbon monoxide \leq 0.88 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 8 Nitrogen oxides \leq 12.21 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 9 Particulate matter (10 microns or less) \leq 0.11 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 10 Sulfur dioxide \leq 0.01 tons/yr. [LAC 33:III.501.C.6]
Which Months: All Year Statistical Basis: Annual maximum
- 11 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]
- 12 Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 13 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 14 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A. [LAC 33:III.5105.A.4]
- 15 Submit Annual Emissions Report (TED): Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 16 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]

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- 17 Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]
- 18 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923. [LAC 33:III.5107.B.2]
- 19 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923. [LAC 33:III.5107.B.3]
- 20 Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii. [LAC 33:III.5107.B.4]
- 21 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]
- 22 Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 23 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112, Table 51.2. [LAC 33:III.5109.B]
- 24 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III, Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 25 Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:I.1701, before commencement of the construction of any new source. [LAC 33:III.5111.A.1]
- 26 Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source. [LAC 33:III.5111.A.2.a]
- 27 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A]
- 28 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 29 Submit notification: Due to the Office of Environmental Assessment, Air Quality Assessment Division, at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test. [LAC 33:III.5113.B.7]
- 30 Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence. [LAC 33:III.5113.C.1]

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- 31 Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ. [LAC 33:III.5113.C.2]
- 32 Submit performance evaluation report: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 60 days of the monitoring system performance evaluation. [LAC 33:III.5113.C.2]
- 33 Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin. [LAC 33:III.5113.C.2]
- 34 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ. [LAC 33:III.5113.C.7]
- 35 Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert. [LAC 33:III.5609.A.1.b]
- 36 Activate the preplanned strategy listed in LAC 33:III.5611.Table 6 when the administrative authority declares an Air Pollution Warning. [LAC 33:III.5609.A.2.b]
- 37 Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency. [LAC 33:III.5609.A.3.b]
- 38 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7. [LAC 33:III.5609.A]
- 39 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901. [LAC 33:III.5901.A]
- 40 Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division. [LAC 33:III.5911.A]
- 41 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate. [LAC 33:III.5911.C]
- 42 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 43 Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:III.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases. [LAC 33:III.927]
- 44 Diethanolamine \leq 1.15 tons/yr. [LAC 33:III.Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 45 Equipment/operational data recordkeeping by electronic or hard copy continuously Maintain records as specified in 40 CFR 61.356(a) through (n). Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF. [40 CFR 61.356]
- 46 Submit report: Due by initial startup. Submit a report that summarizes the regulatory status of each waste stream subject to 40 CFR 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene. Include the information specified in 40 CFR 61.357(a)(1) through (a)(4). If there is no benzene onsite in wastes, products, by-products, or intermediates, submit an initial report that is a statement to this effect. Subpart FF.
On March 4, 1993, Monsanto notified the EPA and LDEQ that the Luling Plant has no benzene present on site in waste, products, by-products, or intermediates. [40 CFR 61.357(a)]
- 47 Submit report: Due whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3). Subpart FF. [40 CFR 61.357(b)]
- 48 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A. [40 CFR 61]

SPECIFIC REQUIREMENTS

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- 49 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 6 of 40 CFR 63 Subpart FFFF. [40 CFR 63.2480]
- 50 Submit initial notification: Due 3/9/2004 or as in (b)(2). As specified in 63.9(b)(3), if you startup your new affected source on or after November 10, 2003, you must submit an initial notification not later than 120 calendar days after you become subject to this subpart. [40 CFR 63.2515(b)]
- 51 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 52 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 53 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 54 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 55 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B. [40 CFR 82.Subpart F]

GRP041 **Hydrogen Flares 1 - 11**

- 56 Opacity \leq 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33-III.1101.B]
Which Months: All Year Statistical Basis: None specified
- 57 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33-III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33-III.1103]
- 58 Opacity \leq 20 percent, except for a combined total of six hours in any 10 consecutive day period, for burning in connection with pressure valve releases for control over process upsets. [LAC 33-III.1105]
Which Months: All Year Statistical Basis: None specified
- 59 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), as soon as possible after the start of burning of pressure valve releases for control over process upsets. Notify in accordance with LAC 33-I.3923. Notification is required only if the upset cannot be controlled in six hours. [LAC 33-III.1105]
- 60 Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33-III.1311.C]
Which Months: All Year Statistical Basis: Six-minute average
- 61 Total suspended particulate \leq 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel). [LAC 33-III.1313.C]
Which Months: All Year Statistical Basis: None specified
- 62 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33-III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33-III.1513]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030001

Permit Number: 2557-V1

Air - Title V Regular Permit Renewal

GRP041 Hydrogen Flares 1 - 11

63 Permittee shall ensure destruction of emissions to the flare stacks by installing, maintaining, and operating according to the manufacturer's specifications a heat sensing device to detect the continuous presence of a flame. Alternate devices may be used with the prior approval of the Air Quality Division, Engineering Section. [LAC 33:III.501.C.6]

GRP042 Hydrogen Flares 6 - 10

64 Comply with the requirements of PSD-LA-623. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. [LAC 33:III.509]

GRP043 Diethanolamine Tanks

65 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 6 of 40 CFR 63 Subpart FFFF. [40 CFR 63.2480]

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Monsanto	AI #:	1096	TEMPO Activity No:	PER20030001
Facility Name:	Luling Plant – DSIDA Unit	Remarks Submitted by:	William C. Rhodes		
Permit Writer:	Scott Templett	Permit Writer Email address:	scott.templet@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Briefing Sheet, Statement of Basis, Specific Requirement 104	The VOC totals on the Briefing Sheet and Statement of Basis are 1.24 TPY; SR 104 VOC total is 1.32 TPY. Also, the value on the Statement of Basis does not correspond with the total derived by adding the individual VOC's shown in the table.	Corrections made. All totals are now the same.
Emission Rate Sheet for Criteria Pollutants	The VOC emissions for the DSIDA Hares are shown as 0.01 TPY, when the actual values are 0.003 TPY.	After discussions, VOC totals changed to 0.006 TPY.
Inventories Section, Page 7	The multiplier for the Fee information is shown as 567.5. This is correct for determining the permit fee, but for the annual fee, it should be 864.	Changed multiplier in TEMPO.
Specific Requirements 97, 98, 99	These three Specific Requirements are redundant. Specific Requirement 98 alone clearly states the compliance requirement.	Deleted Requirements 97 and 99.
Specific Requirement 99	This requirement to comply with the PSD permit does not apply to the entire facility.	Deleted this requirement for facility wide (DSIDA Facility).

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements for Flares	The facility has 11 flares with essentially the same requirements. To streamline the permit, we suggest combining all of the flares into a single group and list all of the requirements for the group just once. Flares 6 – 10 are subject to an additional PSD requirement, so we suggest creating a second group and listing that one requirement for this group.	Created Group 41 for flares 1 – 11 (EQT 117-127) Created Group 42 for flares 6 – 10 (EQT 122-126) Consolidated requirements into these groups.
Specific Requirement 143	This lists the DEA emissions as 1.23 TPY, versus the 1.15 TPY in the Statement of Basis	Corrected this DEA emission in the requirements.
Specific Requirement 149	The phrase "Indicate Date" should be replaced with an actual date; there is also an extraneous symbol prior to one of the regulatory provisions included.	Deleted symbol and added appropriate date.
Specific Requirements 150 - 161	We suggest replacing all of these RMP requirements with the following Specific Requirement that was included in Permit 2533-V3 as Specific Requirement 143: "Comply with the provisions in 40 CFR 68, except as specified in LAC 33:5901. [LAC 33:III.5901.A]."	Deleted all 40 CFR 68 requirements and included one requirements as stated "Comply with ..."